

TO: Mail Stop 8 Director of the U.S. Patent and Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450	REPORT ON THE FILING OR DETERMINATION OF AN ACTION REGARDING A PATENT OR TRADEMARK
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In compliance with 35 U.S.C. § 290 and/or 15 U.S.C. § 1116 you are hereby advised that a court action has been filed in the U.S. District Court for the District of Maryland on the following ☒ Patents or ☐ Trademarks:


DOCKET NO. AMD-08-CV-2202	DATE FILED 8/21/08	U.S. DISTRICT COURT FOR THE DISTRICT OF MARYLAND
PLAINTIFF WALTER KIDDIE PORTABLE EQUIPMENT, INC.		DEFENDANT UNIVERSAL SECURITY INSTRUMENTS, INC., ET AL
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
1 6,791,453		
2		
3		
4		
5		

In the above-entitled case, the following patent(s)/ trademark(s) have been included:

DATE INCLUDED	INCLUDED BY			
	<input type="checkbox"/> Amendment	<input type="checkbox"/> Answer	<input type="checkbox"/> Cross Bill	<input type="checkbox"/> Other Pleading
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK		
1				
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In the above-entitled case, the following decision has been rendered or judgment issued:

DECISION/JUDGMENT

CLERK Felicia C. Cannon	(BY) DEPUTY CLERK 	DATE 8/26/08
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Copy 1—Upon initiation of action, mail this copy to Director Copy 3—Upon termination of action, mail this copy to Director
 Copy 2—Upon filing document adding patent(s), mail this copy to Director Copy 4—Case file copy

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND
(NORTHERN DIVISION)

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
2008 AUG 21 P 3:55

WALTER KIDDE PORTABLE
EQUIPMENT, INC.

Plaintiff,

v.

UNIVERSAL SECURITY
INSTRUMENTS, INC., USI ELECTRIC,
INC.,

Defendants.

Clerk's Office
at Baltimore
Civil Action No.: BY _____ DEPUTY

JURY TRIAL DEMANDED

AMD 08 CV 2202

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff, Walter Kidde Portable Equipment, Inc., for its Complaint against
Defendant Universal Security Instruments, Inc. and USI Electric, Inc., alleges as follows:

NATURE OF LAWSUIT

1. This is a claim for patent infringement arising under the Patent Laws of
the United States, Title 35 of the United States Code. This Court has exclusive
jurisdiction over the subject matter of the Complaint under 28 U.S.C. §1338(a).

PARTIES AND PATENT

2. Plaintiff, Walter Kidde Portable Equipment, Inc., ("Kidde") is a Delaware
corporation having a regular and established place of business at 1394 South Third
Street, Mebane, NC 27302.

3. Defendant, Universal Security Instruments, Inc. ("USI"), upon information
and belief, is a Maryland corporation with its principal place of business at 7-A Gwynns
Mill Court, Owings Mills, Maryland 21117.

4. Defendant, USI Electric, Inc. ("USI Electric"), upon information and belief,

is a Maryland corporation, with its principal place of business at 7-A Gwynns Mill Court, Owings Mills, Maryland 21117, and is believed to be a wholly owned subsidiary of Defendant, USI.

5. The defendants have committed acts of infringement in this judicial district; conduct regular and systematic business in this judicial district; and have purposefully directed their activities at residents of this judicial district.

6. United States Patent No. 6,791,453 ("the '453 patent"), entitled "Communication Protocol for Interconnected Hazardous Condition Detectors, And System Employing Same" issued on September 14, 2004 and has been assigned to Kidde as the owner. A copy of the '453 patent is attached hereto as Exhibit A.

VENUE

7. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(c) and 1400(b).

DEFENDANTS' ACTS OF PATENT INFRINGEMENT

8. Defendant USI has, upon information and belief, made, used, offered for sale and/or sold products that infringe or are used in infringing the '453 patent, or has induced others to manufacture, use, sell and/or offer to sell products in the District of Maryland and elsewhere, through its wholly owned subsidiary, USI Electric, which sells Universal CD-9490 Carbon Monoxide Alarm, and also through USI's sale of other similar products.

9. Defendant USI Electric has, upon information and belief, offered for sale and/or sold products that infringe the '453 patent through its sale in the District of Maryland and elsewhere of products similar to, and including, Universal CD-9490

Carbon Monoxide Alarm.

10. Defendants have infringed, induced others to *infringe* and contributed to the infringement of one or more of the claims of the '453 patent by, among other activities, making, using, selling and/or offering for sale in the District of Maryland and elsewhere, interconnected hazardous condition detectors and systems employing the same, including, but not limited to, the Universal CD-9490 Carbon Monoxide Alarm and similar products, as described and claimed in the '453 patent, without the consent of Kidde.

11. Defendants' infringement has injured Kidde and Kidde is entitled to recover damages adequate to compensate it for such infringement.

12. Defendants' infringement has irreparably harmed Kidde and will continue to harm Kidde, unless and until the defendants are enjoined from infringing the '453.

PRAYER FOR RELIEF

WHEREFORE, plaintiff, Kidde, asks this Court to enter judgment against the defendants, granting the following relief:

- A. An award of damages, together with interest adequate to fully compensate Kidde for the infringement of the '453 patent;
- B. An award to Kidde of all remedies available under 35 U.S.C. §284;
- C. An award to Kidde of all remedies available under 35 U.S.C. §285;
- D. A permanent injunction prohibiting further infringement, inducement and contributory infringement of the '453; and
- E. Such other and further relief as the Court may deem just and proper.

JURY DEMAND

Kidde hereby requests a trial by Jury on all issues so triable.

Respectfully submitted,

/s/

John E. McCann, Jr. (Fed. Bar #10028)
MILES & STOCKBRIDGE, P.C.
12th Floor, 10 Light Street
Baltimore, MD 21202-1487
(410) 385-3586
(410)385-3700 (fax)
jmccann@MilesStockbridge.com

***Attorney for Plaintiff
Walter Kidde Portable Equipment, Inc.***